REMARKS

Claims 1-17 are pending in the present application, of which claims 1, 8, 11 and 15 are independent. No amendments have been made. Applicants believe that the present application is in condition for allowance, which prompt and favorable action is respectfully requested.

I.   SPECIFICATION

As requested by the Examiner, Applicants have amended the title of the application and respectfully submits that the above title is descriptive of the invention and requests that the Examiner withdraw the objection to the title.

II.   REJECTION UNDER 35 U.S.C. §102

The Examiner rejected claims 1 and 5 under 35 U.S.C. §102(b) as being allegedly anticipated by U.S. Patent No. 6,173,173B1 issued to Dean et al. (hereinafter "Dean"). Claims 8-13, 15 and 17 are rejected under 35 U.S.C. §102(b) as being allegedly anticipated by U.S. Patent No. 5,204,902 issued to Reeds, III (hereinafter "Reeds"). The rejection is respectfully traversed in its entirety.

> To anticipate a claim under 35 U.S.C. §102(e), the reference must teach every element of the claim and "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." (see MPEP §2131).

Dean discloses a system and method for terminating invalid mobile telephone call. Particularly, Dean discloses a message flow protocol between a client and a server to tear down a call. As disclosed, the server sends a challenge to a client. The client uses the challenge along with a password stored in the kcsys file to create a signature by appending the password to a random_key obtained from the challenge. (See Dean, col. 15, line 55 to col. 16, line 35). Therefore, the signature is created using an existing password.

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Accordingly, Dean does not disclose or even suggest a subscriber identification module comprising a processor that generates a plurality of keys in response to a received challenge as in independent claim 1. Moreover, Dean does not disclose or even suggest generating an initial value based upon a key from the plurality of keys as in claim 1. Since Dean does not teach every element of claim 1, Applicants respectfully request a withdrawal of the rejection under 35 U.S.C. §102 for at least the foregoing reasons.

Reeds discloses a typical mobile unit for which a service provider assigns a phone number (MIN1), an area code (MIN2) and a secret key (A-key). An electronic serial number (ESN) that is unique to the unit is also installed in the unit by manufacturer. The ESN, MIN1, MIN2 and A-key are to be used for authentication of the mobile unit. (See Reeds, col. 4, lines 27-36 and lines 47-55, and col. 6, lines 3-35).

Accordingly, Reeds does not disclose or even suggest a subscriber identification module comprising a key generation element and a signature generator configured to receive a secret key from the key generation element as in independent claim 8.

Reeds also does not disclose or even suggest a key generator for generating a plurality of keys and a signature generator as in independent claim 11.

Reeds does not disclose or even suggest generating a plurality of keys and transmitting at least one key from the plurality of keys to a communication device communicatively coupled to a subscriber identification device as in independent claims 15.

Moreover, Reeds does not disclose or even suggest a set of instructions for selectively generating a primary signature based upon a key that is private from a mobile station and a secondary signature that is received from the mobile station as in claim 17

Since Reeds does not teach every element of claims 8, 11, 15 and 17, Applicants respectfully request a withdrawal of the rejection under 35 U.S.C. §102 for at least the foregoing reasons.

Also, Applicant submits that claims 5, 8-10 and 12-13 are allowable based on their dependency from an allowable base claim as well as other novel features included therein.

III. REJECTION UNDER 35 U.S.C. §103

The Examiner rejected claim 2 under 35 U.S.C. §103 as being unpatentable over Dean in view of Applied Cryptography (hereinafter Schneiner). Claims 3, 4, 6 and 7 are rejected under 35 U.S.C. §103 as being unpatentable over Dean in view of U.S. Patent No. 6,076,162 issued to Deindl et al. (hereinafter "Deindl"). Claims 14 and 16 are rejected under 35 U.S.C. §103 as being unpatentable over Reeds in view of Schneiner.

> To establish a prima facie case of obviousness for a claimed invention, all the claim elements must be taught or suggested by the prior art. (MPEP 2143.03)

Claims 2-4, 6, 7, 14 and 16 depend from and include all the elements cited in the independent claims 1, 11 and 15 respectively. Accordingly, Applicants submit that these claims are believed to be allowable based on their dependency from an allowable base claim as well as other novel features included therein.
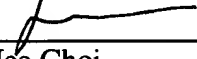
CONCLUSION

In light of the amendments contained herein, Applicants submit that the application is in condition for allowance, for which early action is requested.

Please charge any fees or overpayments that may be due with this response to Deposit Account No. 17-0026.

Respectfully submitted,

Dated: February 24, 2004

By: _____

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